

MISCELLANEOUS TEXT (FEC Form 99)

NAME OF COMMITTEE (In Full)

TURNING POINT PAC INC.

FEC IDENTIFICATION NUMBER

C00814152

Mailing Address 4930 E. BEVERLY ROAD, SUITE 2000

City	State	ZIP Code
PHOENIX	AZ	85044

February 14, 2023

Jamie Curran
Sr. Campaign Finance & Reviewing Analyst
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

Dear Ms. Curran:

Turning Point PAC Inc. (FEC ID C00814152) is in receipt of a Request for Additional Information dated January 11, 2023 referencing the committee's 2022 October Monthly Report. The Committee's response is as follows:

Best Efforts

The Committee takes the following steps to ensure compliance with 11 CFR104.3(a)(4)(i) and 104.7:

All solicitations to prospective donors include the following statement: 'Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in a calendar year.'

If the individual fails to respond to the initial request, the Committee sends a stand-alone follow-up letter requesting the same information. The letter includes a pre-addressed, stamped envelope and contains the following statement:

'Federal law requires that we obtain the attached information regarding your occupation and employment. Please complete the attached form and return it to us as soon as possible in the enclosed envelope.'

If the individual fails to respond to the Committee's requests, the Committee reports donor information pursuant to the guidelines in 11 CFR 104.7(b)(3) and 11 CFR 104.7(b)(4).

Inasmuch as the regulations require the Committee to ask contributors to supply employer/occupation information (as outlined above) but do not compel the contributors to comply with the Committee's requests, the Committee has reported all the information it has in its possession in an attempt to satisfy both the intent and the substance of 11 CFR 100.12, 11 CFR 104.3, and 11 CFR 104.7. In addition, the Committee can find no guidance in the statute or regulations that allow it to add to or subtract from information that is voluntarily provided to it from its contributors nor is there any indication in the statute or regulations that the descriptions referred to are inadequate listings for employer and/or occupation. Finally, the Committee notes that it will update its employer/occupation data as it is received from donors and makes every effort to secure the requested information from all available sources.

Schedule A

The committee has reviewed the receipt from Turning Point Action Inc. dated 9/14/22. The committee has amended its report to clarify that the funds were deposited into the committee's Non-Contribution Account.

Sincerely,

Jeff Webb
Treasurer